

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA

v.

MATTHEW CONNOLLY and  
GAVIN CAMPBELL BLACK,

*Defendants.*

No. 1:16-cr-00370 (CM)

ECF Case

**DEFENDANTS' PROPOSED  
VOIR DIRE QUESTIONS FOR JURORS**

1. Do you have any physical/medical problem(s) that would interfere with your ability to serve as a juror?
2. Do you have any problems with your hearing or vision that would make it difficult for you to serve as a juror?
3. Do you have any difficulty reading or understanding English?
4. The Court and the parties estimate that after a jury is selected, this case may last approximately three (3) weeks. The trial will take place 4 days per week, Monday to Thursday, from 9:30am to 5:00pm into early October. If this would present a serious hardship please explain.
5. Do you know, or have you ever done business, with any of the following people:

Michael Ross Curtler (DB)  
Timothy Parietti (DB)  
James King (DB)  
Matthew Connolly (Defendant)  
Gavin Campbell Black (Defendant)  
Paul Hastings LLP (PH)  
Kenneth M. Breen (PH)  
Phara A. Guberman (PH)  
Jane H. Yoon (PH)  
Amanda Pober (PH)  
Eduardo Gardea (PH)  
Levine Lee LLP  
Seth L. Levine (Levine Lee)  
Miriam L. Alinikoff (Levine Lee)  
Scott B. Klugman (Levine Lee)  
Jillian B. Berman (Levine Lee)

Teena-Ann Sankoorikal (Levine Lee)  
Ellen H. Sise (Levine Lee)  
Dylan A. Stern (Levine Lee)  
Alison L. Anderson (DOJ)  
Carol L. Sipperly (DOJ)  
Richard Powers (DOJ)  
Michael T. Koenig (DOJ)  
Christina Brown (DOJ)  
D. Brittain Shaw (DOJ)  
Daniel M. Tracer (DOJ)  
Mark J. Cipolletti (DOJ)  
Christopher D. Jackson (DOJ)  
Jessee Alexander-Hoeppner (DOJ)  
Michael J. McGillicuddy (FBI)  
Jeffrey Weeks (FBI)

Patrick M. Boone (FBI)  
Kyle Dornbos (FBI)  
Michael P. Kelly (FBI)  
Kendra S. McLamb (FBI)  
Jennifer Riker (FBI)  
Daniel J. Tempone (FBI)  
Thomas Youle (Expert)  
Matthew A. Evans (Expert)  
Dr. Jonathan Arnold (Expert)  
Christopher Rooke (Expert)  
Mary Kay Girimonti (FHLB –  
Pittsburgh)  
Jeffrey A. Sapp (FHLB – Pittsburgh)  
Thomas Westerlund (FHLB –  
Pittsburgh)  
Cindy Konich (FHLB –  
Indianapolis)  
George E. Maroun (FHLB – Boston)  
Annette Hunter (FHLB – Atlanta)  
Debra Young (FHLB – Atlanta)  
Dennis W. Jarecke, Jr. (Keybank)  
Jesse Fogarty (MBIA)  
Manolo Bernardo (Commerzbank)  
Werner Rietze (Commerzbank)  
Michael Barletta (Morgan Stanley)  
Christopher Butler (Internet Archive)  
Michael Kirkwood (CitiGroup)  
Walter Ricciardi (Paul Weiss)  
Steven F. Reich (DB)

Mark Moran (DB)  
Neil Guy (DB)  
Ben Waller (DB)  
Guy Weston Edwards (DB)  
John Ewan (BBA)  
John Hilty (DB)  
Andrew Rivas (DB)  
David Park (DB)  
Andrew Smoler (DB)  
John Bulger (DB)  
Kevin Sullivan (DB)  
Christian Bittar (DB)  
Gurjit Dehl (DB)  
Jeroen Brinkman (DB)  
Matthias Dux (DB)  
Yves Paturel (DB)  
Ed Patrylow (DB)  
Greg Hale (DB)  
David Nicholls (DB)  
Joseph Randazzo (DB)  
Sebastian Bittar (DB)  
Olesya Skofenko (DB)  
Lee Stewart (Rabobank)  
Anthony Allen (Rabobank)  
Bernie Sharpe (Tullet Prebon)  
John Tipper (Tradition)  
Julian Day (Thomson Reuters)  
Stephen Turner (Thomson Reuters)

6. Which city and neighborhood do you live in? How long have you lived there?
7. Are you:
  - (1) employed full-time or self-employed (if so, please name your occupation and employer),
  - (2) retired (if so, please name your prior occupation/employer),
  - (3) student (if so, please indicate area of study), or
  - (4) other?
8. What is your highest level of education?
9. What is your marital status?
10. If you are married, divorced, or living with a significant other, what is that person's occupation? (please list name of employer and title)

11. Do you have children or stepchildren? If yes, state their ages and occupation, if any.
12. Please list any newspapers and magazines (print and/or online websites), radio stations, television shows, and/or podcasts that you read, watch, or listen to, and how often you do so.
13. Please list any clubs or organizations with which you are affiliated.
14. Please list any social media platforms (such as Facebook, Twitter, Snapchat) you use and how often you use them.
15. Do you blog about anything? If yes, about what?
16. Have you or anyone close to you, ever worked at a bank? If yes, please identify who, when, and describe the position(s).
17. Have you or anyone close to you ever traded in securities for a bank, fund, brokerage firm, or for yourself? If yes, please identify who, when, and describe the position(s).
18. Have you or anyone close to you ever worked for a local, state, federal or foreign government/agency? If yes, please identify who, when, and describe the position(s).
19. Have you or anyone close to you ever worked in law enforcement, regulatory, or security field or worked at a state or federal regulatory agency (including prosecutors). If yes, please identify who, when, and describe the position(s).
20. Have you ever had any training or work experience in the law, for example, as a lawyer, judge, U. S. Attorney, paralegal, legal secretary, court reporter, or any other position in a law-related field?
21. Under our system of law, every person who is accused of a crime is presumed innocent. The default position in a criminal case is that the indictment is wrong, that the accusation is not true, and that the defendant is not guilty of the crimes with which he has been charged. Would you have any difficulty with the premise that a defendant who is accused of a crime is presumed to be innocent of that crime? If yes, please explain.
22. The Court will instruct you that you may draw no inference against the defendants from the fact that they have been indicted. Would you have any difficulty following the Court's instructions on this point?
23. The Government has the burden of proof in a criminal case. It is the Government's job to convince you that the presumption of innocence is wrong. The defendants have no burden to do anything at the trial and do not need to prove that they are innocent. Do you believe that it is unfair or wrong that the Government bears the entire burden of proof? If yes, please explain.
24. A defendant in a criminal case has no obligation to take the stand and to testify. The defendant has a constitutional right not to testify. If a defendant does not testify, the jury may not consider that fact in any way in reaching a decision as to whether a defendant is guilty. Do you believe that the defendant must or should testify in order to be found not guilty? If yes, please explain.

25. To meet its burden of proof, the Government must convince every member of the jury, unanimously, beyond a reasonable doubt that the presumption of innocence is wrong. Would you find it unfair or wrong that the Government has a high burden of proof? If yes, please explain.
26. Are you familiar with the Financial Crisis (also known as the Credit Crisis) of 2007/2008?  
  
If yes, do you have any views regarding prosecutions related to the Financial Crisis, or who was responsible for the Financial Crisis? If yes, please explain.
27. Have you or anyone close to you ever had a bad experience with an investment or the stock market? If yes, please explain.
28. You may hear testimony during the trial from members of law enforcement (for example, FBI agents). You should consider the testimony of members of law enforcement just as you would any other evidence in the case and evaluate their testimony just as you would that of any other witness. Would you tend to believe the testimony of a member of law enforcement more or less than any other witness, just for the reason that he or she is a member of law enforcement? If yes, please explain.
29. Some of the witnesses in this case may be cooperating witnesses – those who plead guilty to a crime and testify against a defendant in the hope that they will receive more lenient treatment by the government. Do you have any feelings about cooperating witnesses that would affect your ability to be fair and impartial in this case?
30. Have you done any business with, or owned an account(s) at a Federal Home Loan Bank, Deutsche Bank, KeyBank, Commerzbank, Chase, BNY Mellon (MBIA), Morgan Stanley, JP Morgan Chase, Goldman Sachs, Wells Fargo, Merrill Lynch, Bank of America, Bear Sterns, Lehman Brothers, Natixis (Ixis Financial Products)? If yes, what type of transaction(s) or account(s)?
31. Have you, or has anyone you know, ever been employed by banks or financial reporting institutions such as Thomson Reuters or Bloomberg? If yes, which institution and under what role?
32. Have you ever testified as a witness at any kind of legal proceeding, including a trial? If yes, please explain.
33. Have you ever served as a juror at trial? If yes, please briefly describe the number of case(s) in which you served as a juror, including what sort of case it was, when it happened, and whether the jury reached a verdict.
34. Do you have any personal knowledge of the charges in this case? Have you read or heard anything about this case? If yes, please explain.
35. Have you heard anything about any investigation into banks for conduct related to the setting of the LIBOR rate? If yes, please explain.

36. Have you ever taken out any of the following types of loans: mortgage, home equity line of credit (HELOC), student loan or auto loan? If yes, please indicate whether they were fixed rate loans for variable (floating) rate loans.
37. To the best of your knowledge, have you ever had a loan that had interest rates tied to a benchmark known as LIBOR? If yes, please explain.
38. Have you heard or read anything about cases against individuals concerning the LIBOR rate? If yes, please explain.
39. Have you ever brought any claims or lawsuits against any federal, state, or local government employee or agency?
40. This case involves former traders who worked at large banks during the financial crisis. Is there anything about that fact that makes it difficult for you to be fair and impartial?
41. Have you or anyone close to you ever been the victim of, or witness to, a crime? If yes, please explain.
42. Have you or anyone close to you ever been charged with a crime? If yes, please explain.
43. Is there any reason why you cannot be a fair and impartial juror? If yes, please explain.